

EXHIBIT A

Carrie W. Thomas

Carrie W. Thomas, Clerk
Jackson County, Georgia

IN THE SUPERIOR COURT OF JACKSON COUNTY
STATE OF GEORGIA

GTE USA, INC and,
GS-TECH AMERICA, LLC
Plaintiffs,

vs.

ADM and SFA Engineering Corp.,
Defendants.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION
FILE NO.

COMPLAINT FOR DAMAGES

COMES NOW GTE USA, INC and GS-AMERICA, LLC, Plaintiffs in the above-styled
 action, by and through their undersigned counsel, and files this Complaint against Defendants
 ADM and SFA Engineering Corp., and, in support thereof, shows this Honorable Court the
 following:

1.

GTE USA, INC is a company organized and existing pursuant to the laws of the State of
 Georgia, is in good standing and is authorized to file this Complaint.

2.

GS-TECH AMERICA, LLC is a limited liability company organized and existing
 pursuant to the laws of the State of Georgia, is in good standing and is authorized to file this
 Complaint.

3.

Defendants ADM and SFA Engineering Corp. are general contractors of the SK Battery

America, Inc. located at 1760 Steve Reynolds Industrial Pkwy., Commerce, Georgia 30529, Jackson County, and Defendants' principal place of business is at 1760 Steve Reynolds Industrial Pkwy., Commerce, Georgia 30529, Jackson County. Therefore, Defendants are subject to the jurisdiction and venue of this Court under O.C.G.A. § 14-2-510(b)(2).

4.

Defendants may be served with process of this Summons and Complaint at 1760 Steve Reynolds Industrial Pkwy., Commerce, Georgia 30529, Jackson County.

5.

According to Defendants' request and contract, Plaintiffs are sub-contractors that supplied necessary manpower for the construction of the SK Battery America factory.

6.

Defendants did not make or file any claims concerning the quality of the services that were supplied by Plaintiffs or wage any other valid dispute as to the services in question.

7.

Defendants breached the contract between the parties unilaterally and without cause by failing to pay for the services supplied to them by Plaintiffs.

8.

Defendants are indebted to Plaintiffs in the amount of Six Hundred Thirty-Seven Thousand Eight Hundred and Seventeen Dollars (\$637,817.00), as evidenced by the statements and invoices attached herein as 'Exhibit A.'

9.

Plaintiffs have made numerous demands upon Defendants for payment of the amount

owed to Plaintiffs are prayed for in this Complaint, but to date, said demands have either been ignored or gone unanswered. All of these demands were made prior to the initiation of this action. Plaintiffs, therefore, hereby make a demand for attorney's fees and costs of litigation in that Defendants have been stubbornly litigious as defined in O.C.G.A. §16-6-11.

10.

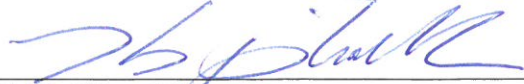
Plaintiffs thereby demand payment and give notice to Defendants pursuant to O.C.G.A. § 13-1-11(a) of its intention to seek such additional charges if the entire balance of the principal and interest is not paid within ten (10) days of the service of this Complaint to Defendants.

WHEREFORE, Plaintiffs pray for the following relief:

- a) That process issue against Defendants according to law;
- b) That Plaintiffs recover from Defendants, jointly and severally, the principal sum of \$637,817.00;
- c) That Plaintiffs recover from Defendants, jointly and severally, prejudgment interest at the rate of eighteen percent (18%) per annum;
- d) That Plaintiffs recover from Defendants, joint and severally, attorney's fees and court costs incurred in prosecuting this action; and
- e) That Plaintiffs have such other and further relief as this Court deems just and proper.

Respectfully submitted this 6th day of January, 2023.

Law Office of Marcus N. Kim, LLC



Philla Kim, ESQ.

State Bar # 174413

Counsel for Plaintiffs

2550 Pleasant Hill Road, Suite 420,

Duluth, Georgia 30096

Phone: (770) 676 – 0434

Fax: (678) 615 – 7984

nkimlaw@gmail.com

GTE 미수금 List

업 체 명	인보이스 발행일	인보이스 NO	발행금액	수금액	미수금
Hanwha	3/26/22	GS122-0326-02	US\$90,770.00	US\$0.00	US\$90,770.00
Hanwha	4/26/22	GS122-0426-02	US\$261,704.00	US\$250,000.00	US\$11,704.00
Hanwha	5/26/22	GS122-0526-02	US\$177,260.00	US\$0.00	US\$177,260.00
GTE	4/26/22	GS122-0426-04	US\$3,748.31	US\$3,748.31	US\$0.00
SFA	4/26/22	GS122-0426-03	US\$264,232.00	US\$200,000.00	US\$64,232.00
SFA	5/26/22	GS122-0526-03	US\$138,075.00	US\$0.00	US\$138,075.00
SFA	6/18/22	GS122-0618-01	US\$107,636.00	US\$0.00	US\$107,636.00
PNE	5/3/22	GS122-0503-01	US\$23,755.00	US\$23,755.00	US\$0.00
PNE	5/9/22	GS122-0509-01	US\$24,915.00	US\$24,915.00	US\$0.00
PNE	5/23/22	GS122-0523-01	US\$17,700.00	US\$0.00	US\$17,700.00
PNE	6/9/22	GS122-0609-01	US\$16,190.00	US\$0.00	US\$16,190.00
PNE	6/18/22	GS122-0618-02	US\$14,250.00	US\$0.00	US\$14,250.00
Total :			US\$1,140,235.31	US\$502,418.31	US\$637,817.00

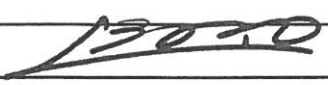


INVOICE

GS - TECH AMERICA LLC,

2705 Daniel Park Run
DACULA, GA 30019
(706) 594-5847
gstech2015@gmail.com

Invoice Date 3/26/22
Invoice Number GSI22-0326-02
Customer PO Number
Payment Term Net 15

Bill To		Remit To		
GTE USA LLC Attn : Myoung-Hwan Shjim/CEO 894 Old Hutchinson Mill Road LaGrange GA30240 Phone : (334)362-0492 E-mail : myounghwanshim@gmail.com		GS - TECH AMERICA LLC, Attn : Sungyoon Lee 2705 Daniel Park Run DACULA, GA 30019 Phone : (706)594-5847		
NO.	Description	Unit	Qty	Amount
1	Labor Cost for SKBA(Hanwha)	lot	1	
	1)Korea Labor cost	m/d	109	US\$49,050.00
	- 02/26~03/25			
	2)Local Labor cost	m/d	94	US\$28,200.00
	- 02/26~03/25			
	3)Rent for Korean Engineer	lot	1	US\$1,850.00
	- 02/26~03/25			
	4)Airplane ticket for Korean engineer	lot	6	US\$11,670.00
Signature : 		TOTAL		US\$90,770.00
Director / Sungyoon Lee		Balance Due		US\$90,770.00



INVOICE

GS - TECH AMERICA LLC,

2705 Daniel Park Run
DACULA, GA 30019
(706) 594-5847
gstech2015@gmail.com

Invoice Date 4/26/22
Invoice Number GSI22-0426-02
Customer PO Number
Payment Term Net 15

Bill To		Remit To		
GTE USA LLC Attn : Myoung-Hwan Shjim/CEO 894 Old Hutchinson Mill Road LaGrange GA30240 Phone : (334)362-0492 E-mail : myounghwanshim@gmail.com		GS - TECH AMERICA LLC, Attn : Sungyoon Lee 2705 Daniel Park Run DACULA, GA 30019 Phone : (706)594-5847		
NO.	Description	Unit	Qty	Amount
1	Labor Cost for SKBA(Hanwha)	lot	1	
	1)Korea Labor cost	m/d	392	US\$176,400.00
	- 03/26~04/25			
	2)Local Labor cost	m/d	191	US\$57,300.00
	- 03/26~04/25			
	3)Rent for Korean Engineer	lot	1	US\$1,850.00
	- 03/26~04/25			
	4)Airplane ticket for Korean engineer	lot	6	US\$11,670.00
	- 04/01			
	5)Korean engineer food expenses	m/d	368	US\$8,372.00
	- 03/26~04/25			
	6)Korean engineer food expenses	m/d	79	US\$2,212.00
	- 03/03~03/25			
	7)Korean engineer vehicle rent	lot	1	US\$3,900.00
	- 03/14~3/25			
Signature :		TOTAL		US\$261,704.00
Director / Sungyoon Lee		Balance Due		US\$261,704.00



INVOICE

GS - TECH AMERICA LLC,

2705 Daniel Park Run
DACULA, GA 30019
(706) 594-5847
gstech2015@gmail.com

Invoice Date 4/26/22
Invoice Number GSI22-0426-03
Customer PO Number
Payment Term Net 15

Bill To		Remit To		
GTE USA. LLC Attn : Myoung-Hwan Shjim/CEO 894 Old Hutchinson Mill Road LaGrange GA30240 Phone : (334)362-0492 E-mail : myounghwanshim@gmail.com		GS - TECH AMERICA LLC, Attn : Sungyoon Lee 2705 Daniel Park Run DACULA, GA 30019 Phone : (706)594-5847		
NO.	Description	Unit	Qty	Amount
1	Labor Cost for SKBA(SFA)	lot	1	
	1)Korea Labor cost	m/d	263	US\$134,100.00
	- 03/26~04/25			
	2)Local Labor cost	m/d	298	US\$78,900.00
	- 03/26~04/25			
	3)Rent for Korean Engineer	lot	1	US\$1,850.00
	- 03/26~04/25			
	4)Airplane ticket for Korean engineer	lot	4	US\$7,780.00
	- 04/01			
	5)Korean engineer food expenses	m/d	298	US\$6,776.00
	- 03/26~04/25			
	6)Korean engineer overtime Labor cost	hours	268	US\$18,760.00
	- 03/26~04/25			
	7)Local overtime Labor cost	hours	162	US\$5,670.00
	- 03/26~04/25			
	8)Korean engineer food expenses	m/d	232	US\$6,496.00
	- 02/26~03/25			
	9)Korean engineer vehicle rent	lot	2	US\$3,900.00
	- 02/26~04/25			
Signature :		TOTAL		US\$264,232.00
Director / Sungyoon Lee		Balance Due		US\$264,232.00

Invoice Date	5/26/22
Invoice Number	GS122-0526-03
Customer PO Number	
Payment Term	Net 15

Bill To		Remit To		
GTE USA, LLC Attn : Myoung-Hwan Shjim/CEO 894 Old Hutchinson Mill Road LaGrange GA30240 Phone : (334)362-0492 E-mail : myounghwanshim@gmail.com		GS - TECH AMERICA LLC, Attn : Sungyoon Lee 2705 Daniel Park Run DACULA, GA 30019 Phone : (706)594-5847		
NO.	Description	Unit	Qty	Amount
1	Labor Cost for SKBA(SFA)	lot	1	
	1)Korea Labor cost	m/d	140	US\$63,000.00
	- 04/26~05/25			
	2)Local Labor cost	m/d	223	US\$66,900.00
	- 04/26~05/25			
	2)Local Over time Labor cost	m/h	13	US\$455.00
	- 04/26~05/25			
	3)Rent for Korean Engineer	lot	1	US\$1,850.00
	- 04/26~05/25			
	5)Korean engineer food expenses	m/d	140	US\$3,920.00
	- 04/26~05/25			
	9)Korean engineer vehicle rent	lot	1	US\$1,950.00
	- 04/26~05/25			
Signature :		TOTAL		US\$138,075.00
Director / Sungyoon Lee		Balance Due		US\$138,075.00



G.T.E USA INC

Tel : 706-350-4315 Fax : 706-350-4334
 myounghwan Shim@gmail.com , gteusainc@gmail.com
 894 Old Hutchinsion Mill Road, Lagrange GA 30240
 1138 Satellite Blvd. Ste 100B, Suwanee, GA 30024

정산자료

Presented to : ADM

Attn : Swung Hyun, Kim / Manager

PROPOSAL No : QADF010802H01

DATE : August 2, 2022

Quotation Subject : ADM - SKBA 2nd Equipment Installation_22년7월30일까지 정산내역서

Description	Size	Q'TY	Unit	U/Price US\$	Amount US\$	Remark
정산 내역 - 11/08/2021 ~ 07/30/2022 기준					\$ 2,549,968.58	
1. 인건비 - 22년7월30일 기준 정산		1	Lot	\$ 1,875,371.00	\$ 1,875,371.00	
2. 장비임대비용 - 22년7월30일 기준 정산		1	Lot	\$ 236,745.61	\$ 236,745.61	
3. 부대비용 - 22년7월30일 기준 정산		1	Lot	\$ 389,156.33	\$ 389,156.33	
4. 조립동 릴 트레이 해포 및 반입 - 총 58 BOX	2주 - 인건비, 장비비 포함	1	Lot	\$ 48,695.64	\$ 48,695.64	

추가금액 내역 - 계약당시 사양서에 비해 일량이 많이 늘어남.

1. 물량 추가(계약시 컨테이너 200대 기준이나 입고된양은 총 416대)로 인한 장비비, 인건비 추가됨.
2. 완전 조립된 상태로 입고된 설비 설치 기준이나 모듈동 설비들은 모두 단품상태로 입고되어 현지 조립 진행으로 인한 장비비, 인건비, 공구, 자재 추가됨
 ---> 모듈동 : 수직반송기(셀버퍼, 완제품) 24대, RTV 8라인, 수조리프트(셀버퍼, 완제품) 10대, 전극동 : RTV, ASRS등등
3. 모듈동, 조립동, 전극동 전체 안전펜스 및 배관 설치 - 사양서에는 내용 없음.
4. 조립동, 전극동 라인 수정사항 수정조치관련해서는 투입인건비로 정산 - 김승현과장 협의

ADM 수금내역 - \$1,020,000(계약금액)

* 계약금액의 90% 결제 \$918,000.00

* 추가금액 반영 결제 \$150,000.00

TOTAL \$1,068,000.00 \$2,804,965.43 \$1,736,965.43

ADM 수금 금액 총 지출 금액 추가 요청 금액

Sub Total

\$ 2,549,968.58

Management & Overhead

%

Profit

10

%

\$ 254,996.86

Grand Total

\$ 2,804,965.43

A) THIS QUOTE IS VALID FOR 30 DAYS.

B) PAYMENT(Check) :

Submitted by

Myounghwan Shim

Engineering G.Manager *mh Shim*

1. 인건비 - 11/08/21 ~ 07/30/22 기준

인건비 TOTAL	\$ 1,875,371.00
미결제 금액	\$ 715,243.00
결제완료 금액	\$ 1,160,128.00

No	Name	투입기간	월별 금액	월별 공수	비고
1	GTE USA INC	11/2021	\$ 19,600.00	56	Day/\$350 기준
		12/2021	\$ 26,950.00	77	
		01/2022	\$ 30,100.00	86	
		02/2022	\$ 25,550.00	73	
		03/2022	\$ 35,000.00	100	
		04/2022	\$ 20,300.00	58	
		05/2022	\$ 16,800.00	48	
		06/2022	\$ 7,000.00	20	
		07/2022	\$ 21,000.00	60	
		SUB TOTAL	\$ 202,300.00		
2	GS Tech America 한국인 : \$450, 현지인 : \$300	11/8-12/31/21	\$ 160,000.00	K : 173 , M : 295.5 = 468.5	결제완료
		1/03-1/25/22	\$ 118,750.00	K : 109 , M : 220 = 329	결제완료
		1/26-2/25/22	\$ 209,350.00	K : 273 , M : 279 = 552	결제완료
		2/26-3/25/22	\$ 210,050.00	K : 232 , M : 346 = 578	결제완료
		4/25/22	\$ 264,232.00	K : 263 , M : 298 = 561	미결제
		5/25/22	\$ 138,075.00	K : 140 , M : 223 = 363	미결제, 5/24 5명 신규투입
		6/15/22	\$ 107,636.00	K : 162 , M : 88 = 250	미결제(6/20/22 접수)
		SUB TOTAL	\$ 1,208,093.00		
3	IL Shin 팀장 : \$350, 팀원 : \$300	12/10/2021	\$ 42,500.00	102	결제완료
		1/10/2022	\$ 42,410.00	156	결제완료
		2/11/2022	\$ 37,768.00	137	결제완료
		SUB TOTAL	\$ 122,678.00		
4	Global Robotics	4/04/2022	\$ 78,250.00	185	1,2월분, 결제완료
		5/26/2022	\$ 69,000.00	215	3,4월분(미결제)
		SUB TOTAL	\$ 147,250.00		
5	Lee's Electric LLC	1/02/2022	\$ 10,000.00	12	인건비(트레일러 전기작업)
		3/25-4/11/2022	\$ 6,750.00	15	Disposal & Wood Packing Box
		SUB TOTAL	\$ 16,750.00		
6	신성기계	4/13-5/13/2022	\$ 42,000.00	106	결제완료, 손팀장외3명, 4/13/22 투입
		5/14-6/15/2022	\$ 45,000.00	112	미결제
		6/16-6/30/2022	\$ 20,800.00	52	미결제
		SUB TOTAL	\$ 107,800.00		
7	JKA	5/23-6/15/2022	\$ 25,200.00	84	모듈동 홍반장외 3명, 5/23투입(미결제)
		6/16-7/30/2022	\$ 45,300.00	151	미결제
		SUB TOTAL	\$ 70,500.00		

2. 장비비 - 업체별 장비 사용비용 집행금액 및 미지급 금액(기간 : 11/08/21 ~ 07/30/22)

No	업체명	용 도	투입 기간	집행금액 TOTAL	미지급금
1	A Crane	2층 양중작업	내역서 참조	\$ 31,935.75	\$ 11,088.00
2	Sun Belt	설비설치,하역	내역서 참조	\$ 105,038.39	\$ 28,262.60
3	United Rental	설비설치,하역	내역서 참조	\$ 77,326.57	\$ 55,221.11
4	H&E Rental	설비설치	내역서 참조	\$ 22,444.90	\$ 13,717.70
			Total	\$ 236,745.61	\$ 108,289.41

3. 부대비용

Total	\$ 389,156.33
--------------	----------------------

No	Name	기간	월별 금액	비 고
1	Roll Off System -Dumpsters	1/2022	\$ 8,345.80	우드박스 폐자재 처리
		2/2022	\$ 3,929.10	
		3/2022	\$ 15,244.45	
		4/2022	\$ 4,770.00	
		5/2022	\$ 4,215.02	
		6/2022	\$ 1,057.64	
		Sub Total	\$ 37,562.01	
2	Greenwashing Mall Maintenance - Dumpster	4/2022	\$ 40,144.80	우드박스 폐자재 처리
		5/2022	\$ 25,349.20	
		6/2022	\$ 27,080.80	
		Sub Total	\$ 92,574.80	
3	Air Gas	11/2021	\$ 984.70	장비 LPG GAS 사용 비용
		12/2021	\$ 2,615.65	
		1/2022	\$ 4,692.05	
		2/2022	\$ 1,975.27	
		3/2022	\$ 7,125.66	
		4/2022	\$ 2,373.11	
		5/2022	\$ 2,801.64	
		6/2022	\$ 1,857.01	
		7/2022	\$ 1,155.72	
		Sub Total	\$ 25,580.81	
4	Satellite Shelter -Mobile Office	12/2022	\$ 12,679.60	트레일러 오피스
		1/2022	\$ 2,295.15	
		2/2022	\$ 2,295.15	
		3/2022	\$ 2,295.15	
		4/2022	\$ 2,295.15	
		5/2022	\$ 2,295.15	
		6/2022	\$ 2,295.15	
		7/2022	\$ 3,145.15	
		8/2022	\$ 2,342.50	
		Sub Total	\$ 31,938.15	
5	United Site Service -화장실	12/2022	\$ 588.02	화장실랜트 및 관리비용
		1/2022	\$ 661.76	
		2/2022	\$ 631.82	
		3/2022	\$ 1,910.33	
		3/2022	\$ 2,360.37	
		4/2022	\$ 1,579.55	
		5/2022	\$ 1,579.55	
		6/2022	\$ 1,700.00	
		7/2022	\$ 1,700.00	
		Sub Total	\$ 12,711.40	

6	SJ Rent a Car	1/2022	\$ 2,550.00	투입인원 렌트차량
		2/2022	\$ 2,550.00	
		3/2022	\$ 2,550.00	
		4/2022	\$ 2,550.00	
		5/2022	\$ 2,550.00	
		6/2022	\$ 2,550.00	
		7/2022	\$ 2,550.00	
		Sub Total	\$ 17,850.00	
7	Misong Rest. -Lunch	12/2021	\$ 1,611.20	출장자 중식비용 (ADM인원 포함)
		1/2022	\$ 3,551.00	
		2/2022	\$ 3,816.00	
		3/2022	\$ 3,392.00	
		4/2022	\$ 3,487.40	
		5/2022	\$ 3,167.28	
		6/2022	\$ 2,862.00	
		7/2022	\$ 1,017.60	
		Sub Total	\$ 22,904.48	
8	Laser Center Corp -Cell Buffer Cutting	4/2022	\$ 4,190.73	셀버퍼 RTV Base 제작 254set
		Sub Total	\$ 4,190.73	
9	Bolt 구매 및 AIR 자재	03/07/2022	\$ 1,402.98	공정별 누락분 볼트 추가구매 Air Fitting 자재구매
		03/08/2022	\$ 3,597.32	
		03/17/2022	\$ 1,846.89	
		03/21/2022	\$ 1,750.00	
		5/26/2022	\$ 789.94	
		Sub Total	\$ 9,387.13	
10	Dakota Mill APT #904&916	11/2021	\$ 4,569.52	출장자 숙소(아파트 렌트비용)
		12/2021	\$ 4,580.92	
		1/2022	\$ 4,558.56	
		2/2022	\$ 4,557.00	
		Sub Total	\$ 18,266.00	
11	Loan T. Huynh- 594 Bishop Court	1/2022	\$ 2,500.00	출장자 숙소
		1/2022	\$ 3,750.00	
		2/2022	\$ 2,500.00	
		3/2022	\$ 2,500.00	
		4/2022	\$ 2,500.00	
		5/2022	\$ 2,500.00	
		Sub Total	\$ 16,250.00	
12	Lee's Guest House	1/2022	\$ 6,970.00	ADM 출장자 숙소
		2/2022	\$ 4,845.00	
		3/2022	\$ 3,515.00	
		4/2022	\$ 4,970.00	
		5/2022	\$ 5,500.00	
		Sub Total	\$ 25,800.00	

13	Oasis Guest House	4/2022	\$ 7,070.00	출장자 숙소
		5/2022	\$ 6,300.00	
		Sub Total	\$ 13,370.00	
14	Amazon	11/2021	\$ 2,514.18	자재 및 공구 구매비용
		12/2021	\$ 639.31	
		1/2022	\$ 3,107.16	
		2/2022	\$ 585.27	
		3/2022	\$ 213.81	
		4/2022	\$ 1,321.65	
		5/2022	\$ 775.60	
		6/2022	\$ 658.83	
		Sub Total	\$ 9,815.81	
15	Home Depot	11/2021	\$ 2,280.91	자재 및 공구 구매비용
		12/2021	\$ 2,457.65	
		1/2022	\$ 2,764.87	
		2/2022	\$ 8,989.93	
		3/2022	\$ 10,479.77	
		4/2022	\$ 7,257.38	
		5/2022	\$ 9,767.33	
		6/2022	\$ 3,250.49	
		7/2022	\$ 3,706.68	
		Sub Total	\$ 50,955.01	

FILED IN OFFICE
CLERK OF SUPERIOR COURT
JACKSON COUNTY, GEORGIA

23CV0020
M - CURRIE MINGLEDORFF
JAN 06, 2023 04:11 PM

Carrie W. Thomas

Carrie W. Thomas, Clerk
Jackson County, Georgia

IN THE SUPERIOR COURT OF JACKSON COUNTY
STATE OF GEORGIA

GTE USA, INC and,
GS-TECH AMERICA, LLC
Plaintiffs,

vs.

ADM and SFA Engineering Corp.,
Defendants.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION
FILE NO.

VERIFICATION

Personally appeared before the undersigned officer, duly authorized to administer oaths, Plaintiff in the above styled action, who after having first duly sworn, deposes and states on oath that the information in the forgoing Complaint is true and correct according to the best of her knowledge, information and ability.

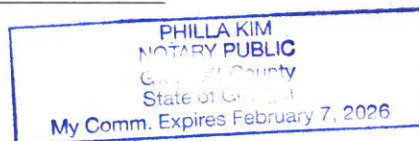
[Signature]

Byoung Min Oh
Representative for Plaintiff GS Tech

Sworn to and subscribed before me
this 20th day of December, 2022.

[Signature]

Notary Public
Commission Expires:



General Civil and Domestic Relations Case Filing Information Form

EFILED IN OFFICE

CLERK OF SUPERIOR COURT
JACKSON COUNTY, GEORGIA☒ Superior or ☐ State Court of Jackson County**23CV0020**M - CURRIE MINGLEDORFF
JAN 06, 2023 04:11 PM

For Clerk Use Only

Date Filed 01-06-2023

MM-DD-YYYY

Case Number 23CV0020*Carrie W. Thomas*Carrie W. Thomas, Clerk
Jackson County, Georgia

Plaintiff(s)

GTE USA, Inc.

Last First Middle I. Suffix Prefix

GTE USA

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney Kim, Marcus N

Defendant(s)

ADM

Last First Middle I. Suffix Prefix

SFA Engineering Corp.

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Bar Number 954665Self-Represented ☐

Check one case type and, if applicable, one sub-type in one box.

General Civil Cases

- ☐ Automobile Tort
- ☐ Civil Appeal
- ☐ Contract
- ☐ Contempt/Modification/Other Post-Judgment
- ☐ Garnishment
- ☒ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
- ☐ Contempt
- ☐ Non-payment of child support, medical support, or alimony
- ☐ Dissolution/Divorce/Separate Maintenance/Alimony
- ☐ Family Violence Petition
- ☐ Modification
- ☐ Custody/Parenting Time/Visitation
- ☐ Paternity/Legitimation
- ☐ Support – IV-D
- ☐ Support – Private (non-IV-D)
- ☐ Other Domestic Relations

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☒ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Korean Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

SHERIFF'S ENTRY OF SERVICECivil Action No. 23CV0020

Superior Court	<input checked="" type="checkbox"/>	Magistrate Court	<input type="checkbox"/>
State Court	<input type="checkbox"/>	Probate Court	<input type="checkbox"/>
Juvenile Court	<input type="checkbox"/>		

Date Filed 01/06/23 04:11 PMGeorgia, JACKSON COUNTY

Attorney's Address **Kim, Marcus N**
Law Office of Marcus N Kim, LLC
2550 Pleasant Hill Rd.
Ste.420
Duluth, GEORGIA 30096-

GTE USA, Inc. ; GTE USAPlaintiff

Name and Address of Party to be Served.

ADM

VS.
ADM ; SFA Engineering Corp.

Defendant1760 Steve Reynolds Industrial PkwyCommerce, GEORGIA 30529Garnishee**SHERIFF'S ENTRY OF SERVICE****PERSONAL**

☐ I have this day served the defendant _____ personally with a copy of the within action and summons.

NOTORIOUS

☐ I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.

☐ Delivered same into hands of _____ described as follows: age, about _____ years; weight _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

☐ Served the defendant _____ a corporation by leaving a copy of the within action and summons with _____ in charge of the office and place of doing business of said Corporation in the County.

TACK & MAIL

☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope properly address to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

☐ Diligent search made and defendant _____ not to be found in the jurisdiction of this court.

This _____ day of _____, 20_____

Deputy

SHERIFF'S ENTRY OF SERVICECivil Action No. 23CV0020

Superior Court	<input checked="" type="checkbox"/>	Magistrate Court	<input type="checkbox"/>
State Court	<input type="checkbox"/>	Probate Court	<input type="checkbox"/>
Juvenile Court	<input type="checkbox"/>		

Date Filed 01/06/23 04:11 PMGeorgia, JACKSON COUNTY

Attorney's Address **Kim, Marcus N**
Law Office of Marcus N Kim, LLC
2550 Pleasant Hill Rd.
Ste.420
Duluth, GEORGIA 30096-

GTE USA, Inc. ; GTE USAPlaintiff

Name and Address of Party to be Served.

SFA Engineering Corp.VS.
ADM ; SFA Engineering Corp.Defendant1760 Steve Reynolds Industrial PkwyCommerce, GEORGIA 30529Garnishee**SHERIFF'S ENTRY OF SERVICE****PERSONAL**☐ I have this day served the defendant _____ personally with a copy of the within action and summons.**NOTORIOUS**☐ I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.☐ Delivered same into hands of _____ described as follows: age, about _____ years; weight _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.**CORPORATION**☐ Served the defendant _____ a corporation by leaving a copy of the within action and summons with _____ in charge of the office and place of doing business of said Corporation in the County.**TACK & MAIL**☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope properly address to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.**NON EST**☐ Diligent search made and defendant _____ not to be found in the jurisdiction of this court.

This _____ day of _____, 20_____

Deputy

**SUPERIOR COURT OF JACKSON COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 23CV0020

GTE USA, Inc.
GTE USA

PLAINTIFF

VS.

ADM
SFA Engineering Corp.

DEFENDANTS

SUMMONS

TO: ADM

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Marcus N Kim
Law Office of Marcus N Kim, LLC
2550 Pleasant Hill Rd.
Ste.420
Duluth, Georgia 30096**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 6th day of January, 2023.

Clerk of Superior Court



Camie W. Thomas, Clerk
Jackson County, Georgia

**SUPERIOR COURT OF JACKSON COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 23CV0020

GTE USA, Inc.
GTE USA

PLAINTIFF

VS.

ADM
SFA Engineering Corp.

DEFENDANTS

SUMMONS

TO: SFA ENGINEERING CORP.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Marcus N Kim
Law Office of Marcus N Kim, LLC
2550 Pleasant Hill Rd.
Ste.420
Duluth, Georgia 30096**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 6th day of January, 2023.

Clerk of Superior Court



Camie W. Thomas, Clerk
Jackson County, Georgia

SHERIFF'S ENTRY OF SERVICE

RECEIVED 11/09/2023
DATE 11/10/23

Civil Papers Service Activity Report

JACKSON COUNTY S. O.

Docket No.: 23CV0020A

GA0780000

Report Generated: Monday January 9 2023 1:22 PM

Page 1 of 1

GTE USA, INC; GTE USA

Plaintiff

Vs.

SFA ENGINEERING CORP.

1760 STEVE REYNOLDS INDUSTRIAL PKWY

COMMERCE, GA 30529

Defendant

Court:

Court Date/Time:

Type of Action: COURT SUMMONS (COMPLAINT)

Case #

Zone: D ZONE

Address:

Date Received: 01/09/2023

Does Paper Require Personal Service?:

FILED
SUPERIOR COURT
JACKSON COUNTY GA
2023 JAN 11 AM 8:37
CAMIE W THOMAS, CLERK

Service Attempts

1.) Date:	Time:	Comments:
2.) Date:	Time:	Comments:
3.) Date:	Time:	Comments:
4.) Date:	Time:	Comments:
5.) Date:	Time:	Comments:
6.) Date:	Time:	Comments:
7.) Date:	Time:	Comments:
8.) Date:	Time:	Comments:
9.) Date:	Time:	Comments:
10.) Date:	Time:	Comments:

Service Completed

☐ Personal ServiceDate 1/10/23☐ Notorious Service to☒ Corporate Service to Ashley Cho☐ Tack & Mail☐ Non Est - Reason:☐ Bad Address☐ Evading Service☐ Moved, no forwarding or new address☐ Diligent Search (Explain Reason)☐ Deceased

[Signature]
Deputy Signature

[Signature]
Supervisor Signature

@ 11:30

SHERIFF'S ENTRY OF SERVICECivil Action No. 23CV0020Date Filed 01/06/23 04:11 PM

Attorney's Address **Kim, Marcus N**
Law Office of Marcus N Kim, LLC
2550 Pleasant Hill Rd.
Ste. 420
Duluth, GEORGIA 30096-

Name and Address of Party to be Served.
ADM

1760 Steve Reynolds Industrial Pkwy
Commerce, GEORGIA 30529

Superior Court ☒ Magistrate Court ☐
 State Court ☐ Probate Court ☐
 Juvenile Court ☐

Georgia, JACKSON COUNTY

GTE USA, Inc. ; GTE USA

Plaintiff

VS.

ADM ; SFA Engineering Corp.

Defendant

SHERIFF'S ENTRY OF SERVICE

☐ I have this day served the defendant _____ personally with a copy of the within action and summons.

☐ I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.

☐ Delivered same into hands of _____ described as follows:
 age, about _____ years; weight _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.

Served the defendant SFA ENGINEERING a corporation
 by leaving a copy of the within action and summons with MARCUS N KIM
 in charge of the office and place of doing business of said Corporation in the County.

☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope properly address to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

☐ Diligent search made and defendant not to be found in the jurisdiction of this court.

This 17 day of JAN, 2023

Deputy

RECEIVED 1/09/2023
 DATE

PERSONAL

NOTORIOUS

CORPORATION

TACK & MAIL

NON EST

FILED
 SUPERIOR COURT
 JACKSON COUNTY, GA
 2023 JAN 18 PM 3:18
 CAMIE W THOMAS, CLERK

Civil Papers Service Activity Report

JACKSON COUNTY S. O.

Docket No.: 23CV0020

GA0780000

Report Generated: Monday January 9 2023 1:18 PM

Page 1 of 1

GTE USA, INC; GTE USA

Plaintiff

Vs.

ADM

1760 STEVE REYNOLDS INDUSTRIAL PKWY

COMMERCE, GA 30529

Defendant

Court:

Court Date/Time:

Type of Action: COURT SUMMONS (COMPLAINT)

Case #

Zone: D ZONE

Address:

Date Received: 01/09/2023

Does Paper Require Personal Service?: ☐ N

Service Attempts

1.) Date: <u>1/10/2023</u>	Time: <u>11:30</u>	Comments: <u>3rd party stated not out of</u>
2.) Date: _____	Time: _____	Comments: <u>facility call tomorrow</u>
3.) Date: _____	Time: _____	Comments: _____
4.) Date: _____	Time: _____	Comments: _____
5.) Date: _____	Time: _____	Comments: _____
6.) Date: _____	Time: _____	Comments: _____
7.) Date: _____	Time: _____	Comments: _____
8.) Date: _____	Time: _____	Comments: _____
9.) Date: _____	Time: _____	Comments: _____
10.) Date: _____	Time: _____	Comments: _____

FILED
SUPERIOR COURT
JACKSON COUNTY GA
2023 JAN 18 PM 3:18
CAMIE W THOMAS, CLERK

Service Completed

☐ Personal ServiceDate 01/17/23☐ Notorious Service to _____☒ Corporate Service to JANGHUN YI - SHI☐ Tack & Mail☐ Non Est - Reason:☐ Bad Address ☐ Evading Service☐ Moved, no forwarding or new address _____☐ Diligent Search (Explain Reason) _____☐ DeceasedSAGE A4310

Deputy Signature

1331

OS

Supervisor Signature